UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF OHIO EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION OPIATE LITIGATION

MDL No. 2804

THIS DOCUMENT RELATES TO:

Case No. 1:17-MD-2804

All Cases

Judge Dan Aaron Polster

NOTICE OF SIXTH AMENDED BANKRUPTCY COURT ORDER GRANTING INJUNCTION AGAINST CONTINUATION OF PROCEEDINGS AS TO RELATED PARTIES TO DEBTOR PURDUE PHARMA L.P. AND AFFILIATED DEBTORS

On February 17, 2020, the United States Bankruptcy Court for the Southern District of New York (the "Bankruptcy Court") issued an order extending the preliminary injunction that modified the Bankruptcy Court's previous injunctions, including the injunction that was attached to the undersigned Related Party Defendants' Amended Notice of Fifth Amended Bankruptcy Court Order, filed January 17, 2020 in this multi-district action (Doc. 3088). *See* Sixth Amended Order Pursuant to 11 U.S.C. § 105(a) Granting Motion for a Preliminary Injunction, *In re Purdue Pharma L.P., et al.*, No. 19-23649 (RDD), Adv. Pro. No. 19-08289 (RDD), Dkt. No. 139 (Bankr. S.D.N.Y. Feb. 17, 2020) (the "Sixth Amended Preliminary Injunction Order"), a copy of which (without appendices) is attached as <u>Exhibit 1</u> hereto. The Sixth Amended Preliminary Injunction Order remains in place through and including April 8, 2020. *See* Ex. 1 at 6.

Numerous plaintiffs currently in this multi-district proceeding have also agreed to abide by the terms of the Injunction without the need to have any order entered against them. *See id.* at 5, \P (g). Those plaintiffs are further identified in the Verified Statement of the Multi-State

Governmental Entities Group Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, filed in *In re Purdue Pharma L.P.*, No. 19-23649 (RDD), Doc. # 409, Ex. A (Bankr. S.D.N.Y. Oct. 30, 2019), subject to certain rights to withdraw their consent as set forth in the Sixth Amended Preliminary Injunction Order.

Notwithstanding the filing of this notice, the undersigned Related Party Defendants expressly preserve all of their defenses, including, but not limited to, the lack of personal jurisdiction.

Respectfully submitted,

/s/ Stuart G. Parsell

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Attorneys for Defendants Richard Sackler, Jonathan Sackler, Mortimer D.A. Sackler, Kathe Sackler, Ilene Sackler Lefcourt, Theresa Sackler, David Sackler, the Estate of Raymond Sackler, Rosebay Medical Company L.P., Rosebay Medical Company, Inc., Beacon Company, and Richard Sackler and Jonathan Sackler as alleged Trustees of the alleged Trust for the Benefit of Members of the Raymond Sackler Family, and Former Attorneys to Beverly Sackler

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CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of February, 2020, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system. Notice of this filing will be sent to all counsel of record by operation of the Court's electronic filing system.

/s/ Stuart G. Parsell

Stuart G. Parsell (Ohio Bar No. 0063510)